

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

No. 17 BK-3567-LTS

**INFORMATIVE MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING CONFIRMATION HEARING AND OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for Hearing on Confirmation of HTA Plan of Adjustment and August 17-18, 2022, Omnibus Hearing* [Case No. 17-3567, ECF No. 1270] (the "HTA Confirmation and Omnibus Hearing Procedures Order"), the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as sole Title III representative of the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.

Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, HTA, ERS, and PREPA, the “Debtors”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully states as follows:

I. Appearance at Confirmation Hearing

1. Depending on which witness and/or issue is being addressed at any given time, consistent with the parameters of the HTA Confirmation Hearing Procedures Order, and as described in the Party Appearance Sheet attached as **Exhibit A**, the following attorneys may appear on behalf of the Oversight Board at the confirmation hearing beginning on August 17, 2022 at 9:30 a.m. (Atlantic Time) (the “HTA Confirmation Hearing”):

- i. Martin J. Bienenstock (mbienenstock@proskauer.com);
- ii. Brian S. Rosen (brosen@proskauer.com);
- iii. Michael A. Firestein (mfirestein@proskauer.com);
- iv. Lary A. Rappaport (lrappaport@proskauer.com);
- v. Michael T. Mervis (mmervis@proskauer.com);
- vi. Steve Y. Ma (sma@proskauer.com);
- vii. Jeffrey W. Levitan (jlevitan@proskauer.com);
- viii. Hermann D. Bauer-Álvarez (hermann.bauer@oneillborges.com); and
- ix. Gabriel A. Miranda (gabriel.miranda@oneillborges.com).

2. As described in the Party Appearance Sheet attached as **Exhibit A**, the Oversight Board will present opening and closing statements in support of confirmation of the *Third*

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority
[ECF No. 1240].

3. With respect to cross-examination of witnesses tendered by other parties, the Oversight Board does not presently intend to cross-examine such witnesses (and only one such witness has been identified as of the date of this filing). However, the Oversight Board reserves the right to conduct cross-examination that is in the best interests of the Oversight Board and the Debtor, including, but not limited to, by addressing additional factual issues, requesting additional time, or proffering additional exhibits as may be appropriate.

4. With respect to rebuttal, the Oversight Board reserves the right, depending on the scope, substance, and length of the testimony elicited in the objecting parties' case in chief, to present rebuttal testimony (i) from any Oversight Board witness listed on the Party Witness Cover Sheet attached hereto as **Exhibit B**, (ii) addressing any factual issues and subject matter raised in the objecting parties' case in chief, (iii) in an amount of time that is appropriate given such case in chief, and (iv) proffering any exhibits set forth on the Party Exhibit Cover Sheet attached hereto as **Exhibit C** in connection with such rebuttal testimony.

5. Notwithstanding anything in this Informative Motion, the Oversight Board reserves the right to conduct cross-examination, redirect, or rebuttal testimony at the HTA Confirmation Hearing in a manner that is in the best interests of the Oversight Board and the Debtor, including, but not limited to, by addressing additional factual issues, requesting additional time, or proffering additional exhibits as may be appropriate.

6. The Oversight Board further reserves all rights, including the right to use exhibits identified on other parties' exhibit lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, and the right to revise, amend and/or supplement this list, for reasons

including but not limited to if the Confirmation Hearing scheduled to commence on August 17, 2022 is adjourned or if the Plan is modified.

II. Appearance at Omnibus Hearing

7. The following attorneys will appear on behalf of the Oversight Board at the Omnibus Hearing, which will commence immediately upon the conclusion of the HTA Confirmation Hearing:

- i. Martin J. Bienenstock (mbienenstock@proskauer.com);
- i. Brian S. Rosen (brosen@proskauer.com);
- ii. Paul V. Possinger (ppossinger@proskauer.com);
- iii. Steve Y. Ma (sma@proskauer.com);
- iv. Libbie B. Osaben (losaben@proskauer.com);
- v. Hermann D. Bauer-Álvarez (hermann.bauer@oneillborges.com); and
- vi. Gabriel A. Miranda (gabriel.miranda@oneillborges.com).

8. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report.

9. Paul V. Possinger of Proskauer Rose LLP will appear and seek to be heard on the *Second Omnibus Motion of Puerto Rico Electric Power Authority for Order (a) Approving PREPA's Rejection of Certain Power Purchase and Operating Agreements, and (b) Granting Related Relief* [Case No. 17-3283, ECF No. 21521; Case No. 17-4780, ECF No. 2893] (the "PREPA PPOA Motion"), as well as any and all related objections, responses, statements, joinders, and replies to the PREPA PPOA Motion.

10. Brian S. Rosen of Proskauer Rose LLP will appear and seek to be heard on the *Debtors' Motion for an Order Extending the Deadline to File Objections to Proofs of Claim* [Case

No. 17-3283, ECF No. 21601] (the “POC Extension Motion”), as well as any and all related objections, responses, statements, joinders, and replies to the POC Extension Motion.

11. Brian S. Rosen and Libbie B. Osaben of Proskauer Rose LLP will appear and seek to be heard on the Debtor’s omnibus objections to claims scheduled to be heard at the August omnibus hearing, as well as any and all related objections, responses, statements, joinders, and replies to the omnibus objections to claims.

12. Martin J. Bienenstock, Brian S. Rosen, Paul V. Possinger, Steve Y. Ma, and Libbie B. Osaben, reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

13. Pursuant to the HTA Confirmation and Omnibus Hearing Procedures Order, attached hereto as Exhibits A, B, and C, respectively, are the Oversight Board’s Party Appearance Sheet, Party Witness Cover Sheet, and Party Exhibit Cover Sheet.

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WHEREFORE, the Oversight Board respectfully requests that the Court take notice of the foregoing.

Dated: July 28, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen
Martin J. Bienenstock
Brian S. Rosen
(Admission *pro hac vice*)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

*Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*

/s/ Hermann D. Bauer-Álvarez
Hermann D. Bauer-Álvarez
USDC No. 215205
O'NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944

*Co-Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*

Exhibit A

Party Appearance Sheet

EXHIBIT A

PARTY APPEARANCE SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico (the “ <u>Oversight Board</u> ”).	Is the party attending the Confirm. Hearing, Omnibus Hearing, or Both? Both.
I. Attorney Appearance at the Confirm. Hearing		
A. Opening Statements and Public Comment		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Martin J. Bienenstock
	Law Firm	Proskauer Rose LLP
	Email	mbienenstock@proskauer.com
	Phone Number	212-969-4530
	Docket Entry No. of Notice of Appearance	Docket Entry No. 90
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Brian S. Rosen
	Law Firm	Proskauer Rose LLP
	Email	brosen@proskauer.com
	Phone Number	212-969-3380
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1902
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Michael A. Firestein
	Law Firm	Proskauer Rose LLP
	Email	mfirestein@proskauer.com
	Phone Number	310-284-5661
	Docket Entry No. of Notice of Appearance	Docket Entry No. 637
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Lary A. Rappaport
	Law Firm	Proskauer Rose LLP
	Email	lrappaport@proskauer.com

	Phone Number	310-284-5658
	Docket Entry No. of Notice of Appearance	Docket Entry No. 441
B. Witness Examination		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Brian S. Rosen
	Law Firm	Proskauer Rose LLP
	Email	brosen@proskauer.com
	Phone Number	212-969-3380
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1902
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Michael A. Firestein
	Law Firm	Proskauer Rose LLP
	Email	mfirestein@proskauer.com
	Phone Number	310-284-5661
	Docket Entry No. of Notice of Appearance	Docket Entry No. 637
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Lary A. Rappaport
	Law Firm	Proskauer Rose LLP
	Email	lrappaport@proskauer.com
	Phone Number	310-284-5658
	Docket Entry No. of Notice of Appearance	Docket Entry No. 441
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Steve Y. Ma
	Law Firm	Proskauer Rose LLP
	Email	sma@proskauer.com
	Phone Number	310-284-5605
	Docket Entry No. of Notice of Appearance	Docket Entry No. 4708
C. Objection Arguments		

ATTORNEY 1	Appearance Method	In Person – PR
	Name	Martin J. Bienenstock
	Law Firm	Proskauer Rose LLP
	Email	mbienenstock@proskauer.com
	Phone Number	212-969-4530
	Docket Entry No. of Notice of Appearance	Docket Entry No. 90
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Brian S. Rosen
	Law Firm	Proskauer Rose LLP
	Email	brosen@proskauer.com
	Phone Number	212-969-3380
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1902
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Michael A. Firestein
	Law Firm	Proskauer Rose LLP
	Email	mfirestein@proskauer.com
	Phone Number	310-284-5661
	Docket Entry No. of Notice of Appearance	Docket Entry No. 637
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Lary A. Rappaport
	Law Firm	Proskauer Rose LLP
	Email	lrappaport@proskauer.com
	Phone Number	310-284-5658
	Docket Entry No. of Notice of Appearance	Docket Entry No. 441
D. Closing Statements		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Martin J. Bienenstock
	Law Firm	Proskauer Rose LLP
	Email	mbienenstock@proskauer.com

	Phone Number	212-969-4530
	Docket Entry No. of Notice of Appearance	Docket Entry No. 90
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Brian S. Rosen
	Law Firm	Proskauer Rose LLP
	Email	brosen@proskauer.com
	Phone Number	212-969-3380
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1902
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Michael A. Firestein
	Law Firm	Proskauer Rose LLP
	Email	mfirestein@proskauer.com
	Phone Number	310-284-5661
	Docket Entry No. of Notice of Appearance	Docket Entry No. 637
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Lary A. Rappaport
	Law Firm	Proskauer Rose LLP
	Email	lrappaport@proskauer.com
	Phone Number	310-284-5658
	Docket Entry No. of Notice of Appearance	Docket Entry No. 441
Depending on which witness and/or issue is being addressed at any given time, consistent with the parameters of the HTA Confirmation Hearing Procedures Order, the following additional attorneys may appear on behalf of the Oversight Board at the Confirm. Hearing:		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Michael T. Mervis
	Law Firm	Proskauer Rose LLP
	Email	mmervis@proskauer.com
	Phone Number	212-969-3565
	Docket Entry No. of Notice of Appearance	Docket Entry No. 6861

ATTORNEY 2	Appearance Method	In Person – PR
	Name	Jeffrey W. Levitan
	Law Firm	Proskauer Rose LLP
	Email	jlevitan@proskauer.com
	Phone Number	212-969-3239
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1939
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Hermann D. Bauer-Álvarez
	Law Firm	O’Neill & Borges LLC
	Email	hermann.bauer@oneillborges.com
	Phone Number	787-282-5723
	Docket Entry No. of Notice of Appearance	N/A
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Gabriel A. Miranda
	Law Firm	O’Neill & Borges LLC
	Email	gabriel.miranda@oneillborges.com
	Phone Number	787-282-5713
	Docket Entry No. of Notice of Appearance	N/A
II. Attorney Appearance at the Omnibus Hearing		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Martin J. Bienenstock
	Law Firm	Proskauer Rose LLP
	Email	mbienenstock@proskauer.com
	Phone Number	212-969-4530
	Docket Entry No. of Notice of Appearance	Docket Entry No. 90
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Brian S. Rosen
	Law Firm	Proskauer Rose LLP
	Email	brosen@proskauer.com

	Phone Number	212-969-3380
	Docket Entry No. of Notice of Appearance	Docket Entry No. 1902
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Libbie B. Osaben
	Law Firm	Proskauer Rose LLP
	Email	losaben@proskauer.com
	Phone Number	312-962-3571
	Docket Entry No. of Notice of Appearance	Docket Entry No. 21624
ATTORNEY 4	Appearance Method	In Person – PR
	Name	Paul V. Possinger
	Law Firm	Proskauer Rose LLP
	Email	ppossinger@proskauer.com
	Phone Number	312-962-3570
	Docket Entry No. of Notice of Appearance	Docket Entry No. 90
The following additional attorneys may appear on behalf of the Oversight Board at the Omnibus Hearing:		
ATTORNEY 1	Appearance Method	In Person – PR
	Name	Steve Y. Ma
	Law Firm	Proskauer Rose LLP
	Email	sma@proskauer.com
	Phone Number	310-284-5605
	Docket Entry No. of Notice of Appearance	Docket Entry No. 4708
ATTORNEY 2	Appearance Method	In Person – PR
	Name	Hermann D. Bauer-Álvarez
	Law Firm	O'Neill & Borges LLC
	Email	hermann.bauer@oneillborges.com
	Phone Number	787-282-5723

	Docket Entry No. of Notice of Appearance	N/A
ATTORNEY 3	Appearance Method	In Person – PR
	Name	Gabriel A. Miranda
	Law Firm	O'Neill & Borges LLC
	Email	gabriel.miranda@oneillborges.com
	Phone Number	787-282-5713
	Docket Entry No. of Notice of Appearance	N/A
ADDITIONAL ATTORNEY OBSERVATION	<p>Complete the below information for each attorney appearing for observation purposes.</p> <p>Name</p> <p>Observation Method</p> <ul style="list-style-type: none"> • CourtSolutions Listen Only • In Person – PR • In Person – NY <p>Law Firm</p> <p>Email</p> <p>Phone Number</p>	
I. Observation at Confirm. Hearing		
ATTORNEY 1	Name	Jamie A. El Koury
	Observation Method	In Person – PR
	Law Firm	General Counsel to the Oversight Board
	Email	jaime.elkoury@promesa.gov
	Phone Number	646-932-6069
ATTORNEY 2	Name	Libbie B. Osaben
	Observation Method	In Person – PR
	Law Firm	Proskauer Rose LLP
	Email	losaben@proskauer.com
	Phone Number	312-962-3571
INDIVIDUAL 3	Name	Griffin M. Asnis

	Observation Method	In Person – PR
	Law Firm	Proskauer Rose LLP
	Email	gasnis@proskauer.com
	Phone Number	212-969-3587

Exhibit B

Party Witness Cover Sheet

EXHIBIT B
PARTY WITNESS COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico (the “ <u>Oversight Board</u> ”), as sole Title III representative of the Puerto Rico Highways and Transportation Authority (“ <u>HTA</u> ” or the “ <u>Debtor</u> ”)
Does the Party intend to offer a witness?	Yes
Total Number of Witnesses	5 ¹

[Continued on following pages]

¹ The Total Number of Witnesses only includes the Debtor’s witnesses.

Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)	Scope of Testimony or Cross-Examination
David A. Skeel, Jr.	Fact Witness	No	<p>Testimony showing (i) the HTA Plan complies with the provisions of PROMESA section 314(b)(1), including, without limitation, that it complies with the provisions of Bankruptcy Code sections 1122, 1123(a)(1), 1123(a)(2), 1123(a)(3), 1123(a)(4), 1123(a)(5), 1123(b)(1), 1123(b)(2), 1123(b)(3), 1123(b)(4), 1123(b)(5), 1123(b)(6), 1123(d), 1129(a)(2), 1129(a)(3), 1129(a)(6), 1129(a)(8) (if applicable), 1129(b)(1), 1129(b)(2)(A), and 1129(b)(2)(B), PROMESA sections 314(b)(2), 314(b)(3), 314(b)(4), 314(b)(5), 314(b)(6) and 314(b)(7), (ii) the payment of Consummation Costs or Restriction Fees, as well as the settlement agreements under the HTA Plan are reasonable and fair, (iii) the releases, injunctions, and exculpation provisions provided in the HTA Plan are reasonable and appropriate, integral to the HTA Plan, and constitute an essential component of the compromises discussed above and in the HTA Plan, and (iv) the preempted Commonwealth statutes, or portions thereof, are inconsistent with PROMESA.</p>

Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)	Scope of Testimony or Cross-Examination
Christina Pullo	Fact Witness	No	Testimony showing (i) which Classes of Claims voted to accept the HTA Plan in accordance with Bankruptcy Code section 1126(c) and as set forth in Bankruptcy Code section 1129(a)(8)(A), (ii) which Impaired Classes of Claims voted to accept the HTA Plan, determined without including any acceptance of the HTA Plan by an insider, in accordance with Bankruptcy Code section 1129(a)(10), and (iii) the procedures employed in soliciting and tabulating votes.
Ojas Shah ^{*2}	Fact and Expert Witness	No	Testimony explaining the best interests test analysis shows the HTA Plan is in the best interests of the creditors of the Debtor.
Jay Herriman [*]	Fact and Expert Witness	No	Testimony showing the reasonableness of the assumptions made with respect to the total amount of Allowed unsecured claims and other categories of claims asserted against HTA, as part of proof that the HTA Plan is in the best interests of the creditors of HTA.

² * Witnesses identified with an asterisk (“*”) were set forth in the Debtor’s Identification of Expert Witnesses [Case No. 17-3567, ECF No. 1260] as witnesses who may offer testimony pursuant to Fed. R. Civ. P. 26(a)(2)(C).

Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)	Scope of Testimony or Cross-Examination
David Brownstein*	Fact and Expert Witness	No	Testimony showing (i) the HTA Plan is consistent with the HTA Fiscal Plan, which provides HTA will be able to satisfy its obligations under the HTA Plan; (ii) the sources and uses of cash required on the Effective Date under the HTA Plan; (iii) the HTA Plan is feasible because HTA will be able to sustainably provide municipal services and meet the HTA Plan obligations without the need for further financial reorganization; (iv) the settlements embodied in the HTA/CCDA Plan Support Agreement and the DRA Stipulation, and incorporated into the HTA Plan, are fair and reasonable; and (v) consummation of the transactions contemplated by the HTA Plan will allow HTA to access the capital markets.

Exhibit C

Exhibit Cover Sheet

EXHIBIT C
PARTY EXHIBIT COVER SHEET¹

Name of Party	Financial Oversight and Management Board for Puerto Rico (the “ <u>Oversight Board</u> ”), as sole Title III representative of the Puerto Rico Highways and Transportation Authority (“ <u>HTA</u> ” or the “ <u>Debtor</u> ”).
Does the Party intend to offer evidence?	Yes
Docket Entry No. for Party Exhibit List	Docket Entry Nos. 1299; 1300; 1302

Exhibit Identifier	Docket Entry No. of Exhibit ²	Is there a pending request to seal this Exhibit?
Debtor’s Ex. 1	Docket Entry No. 1299-1	No
Debtor’s Ex. 2	Docket Entry Nos. 1299-2; 1299-3	No
Debtor’s Ex. 3	Docket Entry No. 1299-4	No
Debtor’s Ex. 4	Docket Entry No. 1299-5	No
Debtor’s Ex. 5	Docket Entry No. 1299-6	No
Debtor’s Ex. 6	Docket Entry No. 1299-7	No
Debtor’s Ex. 7	Docket Entry No. 1299-8	No
Debtor’s Ex. 8	Docket Entry No. 1299-9	No
Debtor’s Ex. 9	Docket Entry Nos. 1299-10; 1299-11	No
Debtor’s Ex. 10	Docket Entry No. 1299-12	No
Debtor’s Ex. 11	Docket Entry No. 1299-13	No
Debtor’s Ex. 12	Docket Entry No. 1299-14	No

¹ The Oversight Board reserves all rights, including the right to use exhibits identified on other parties’ exhibit lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, and the right to revise, amend and/or supplement this list, for reasons including but not limited to if the Confirmation Hearing scheduled to commence on August 17, 2022 is adjourned or if the Plan is modified.

² Unless otherwise stated, all Docket Entry Nos. shall refer to the docket in Case No. 17-3567.

Exhibit Identifier	Docket Entry No. of Exhibit ²	Is there a pending request to seal this Exhibit?
Debtor's Ex. 13	Docket Entry No. 1299-15	No
Debtor's Ex. 14	Docket Entry No. 1299-16	No
Debtor's Ex. 15	Docket Entry No. 1299-17	No
Debtor's Ex. 16	Docket Entry No. 1299-18	No
Debtor's Ex. 17	Docket Entry No. 1299-19	No
Debtor's Ex. 18	Docket Entry No. 1299-20	No
Debtor's Ex. 19	Docket Entry No. 1299-21	No
Debtor's Ex. 20	Docket Entry No. 1299-22	No
Debtor's Ex. 21	Docket Entry No. 1300-1	No
Debtor's Ex. 22	Docket Entry No. 1300-2	No
Debtor's Ex. 23	Docket Entry No. 1300-3	No
Debtor's Ex. 24	Docket Entry No. 1300-4	No
Debtor's Ex. 25	Docket Entry No. 1300-5	No
Debtor's Ex. 26	Docket Entry No. 1300-6	No
Debtor's Ex. 27	Docket Entry No. 1300-7	No
Debtor's Ex. 28	Docket Entry No. 1300-8	No
Debtor's Ex. 29	Docket Entry No. 1300-9	No
Debtor's Ex. 30	Docket Entry No. 1300-10	No
Debtor's Ex. 31	Docket Entry No. 1300-11	No
Debtor's Ex. 32	Docket Entry No. 1300-12	No
Debtor's Ex. 33	Docket Entry No. 1300-13	No
Debtor's Ex. 34	Docket Entry No. 1300-14	No
Debtor's Ex. 35	Docket Entry No. 1300-15	No
Debtor's Ex. 36	Docket Entry No. 1300-16	No

Exhibit Identifier	Docket Entry No. of Exhibit ²	Is there a pending request to seal this Exhibit?
Debtor's Ex. 37	Docket Entry No. 1300-17	No
Debtor's Ex. 38	Docket Entry No. 1300-18	No
Debtor's Ex. 39	Docket Entry No. 1300-19	No
Debtor's Ex. 40	Docket Entry No. 1300-20	No
Debtor's Ex. 41	Docket Entry No. 1302-1	No
Debtor's Ex. 42	Docket Entry No. 1302-2	No
Debtor's Ex. 43	Docket Entry No. 1302-3	No
Debtor's Ex. 44	Docket Entry No. 1302-4	No
Debtor's Ex. 45	Docket Entry No. 1302-5	No
Debtor's Ex. 46	Docket Entry No. 1302-6	No
Debtor's Ex. 47	Docket Entry No. 1302-7	No
Debtor's Ex. 48	Docket Entry No. 1302-8	No
Debtor's Ex. 49	Docket Entry No. 1302-9	No
Debtor's Ex. 50	Docket Entry No. 1302-10	No
Debtor's Ex. 51	Docket Entry No. 1302-11	No
Debtor's Ex. 52	Docket Entry No. 1302-12	No
Debtor's Ex. 53	Docket Entry No. 1302-13	No
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		